

221037

STATE OF SOUTH CAROLINA

(Caption of Case)

LEONID KADOSHINKOV,

Complainant/Petitioner,

v.

BROAD RIVER ELECTRIC COOPERATIVE,
INC., AND DUKE ENERGY CAROLINAS, LLC.

Respondents.

BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

COVER SHEET

DOCKET

NUMBER: 2009 - 356 - E

(Please type or print)

Submitted by: Trent N. Pruett

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NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

DOCKETING INFORMATION (Check all that apply)

☐ Emergency Relief demanded in petition

☐ Request for item to be placed on Commission's Agenda expeditiously

☐ Other:

INDUSTRY (Check one)

NATURE OF ACTION (Check all that apply)

☒ Electric

☐ Affidavit

☐ Letter

☐ Request

☐ Electric/Gas

☐ Agreement

☐ Memorandum

☐ Request for Certification

☐ Electric/Telecommunications

☐ Answer

☐ Motion

☐ Request for Investigation

☐ Electric/Water

☐ Appellate Review

☐ Objection

☐ Resale Agreement

☐ Electric/Water/Telecom.

☐ Application

☐ Petition

☐ Resale Amendment

☐ Electric/Water/Sewer

☐ Brief

☐ Petition for Reconsideration

☐ Reservation Letter

☐ Gas

☐ Certificate

☐ Petition for Rulemaking

☐ Response

☐ Railroad

☐ Comments

☐ Petition for Rule to Show Cause

☐ Response to Discovery

☐ Sewer

☐ Complaint

☐ Petition to Intervene

☐ Return to Petition

☐ Telecommunications

☐ Consent Order

☐ Petition to Intervene Out of Time

☐ Stipulation

☐ Transportation

☐ Discovery

☒ Prefiled Testimony

☐ Subpoena

☐ Water

☐ Exhibit

☐ Promotion

☐ Tariff

☐ Water/Sewer

☐ Expedited Consideration

☐ Proposed Order

☐ Other:

☐ Administrative Matter

☐ Interconnection Agreement

☐ Protest

☐ Other:

☐ Interconnection Amendment

☐ Publisher's Affidavit

☐ Late-Filed Exhibit

☐ Report

Print Form

Reset Form

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January 5, 2010

Public Service Commission of South Carolina
Attention: Docketing Department
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Office of Regulatory Staff
1401 Main Street, Suite 900
Columbia, South Carolina 29201
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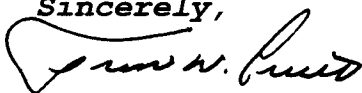
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**Re: Leonid Kadoshnikov v. Broad River Electric Cooperative, Inc.,
and Duke Energy Carolinas, Docket No.: 2009-356-E**

To Whom It Concerns:

Please find enclosed the "Prefiled Reply Testimony of Douglas Wilson," in the above cited action. Also enclosed is a Certificate of Service By Mail, which reflects that Broad River Electric Cooperative, Inc., has served the other parties to this action. Please contact my office if you have any questions about this matter.

Sincerely,



Trent N. Pruett

**Enclosed: Prefiled Testimony of Douglas Wilson/Cover
Sheet/Certificate of Service by Mail**

c: Leonid Kadoshnikov
153 Gaines Drive
Inman, South Carolina 29349
(CERTIFIED MAIL)

Catherine E. Heigel, Assistant General Counsel
Duke Energy Corp.
526 South Church Street, EC03T
Charlotte, North Carolina 28202
(CERTIFIED MAIL)

Broad River Electric Cooperative, Inc.
Attn: J. Richard Baines, President and CEO
Post Office Box 2269
Gaffney, South Carolina 29342

Broad River Electric Cooperative, Inc.
Attn: Douglas Wilson, Assistant Manager
Post Office Box 2269
Gaffney, South Carolina 29342

STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION

DOCKET NO.: 2009-356-E

LEONID KADOSHNIKOV,)	
)	
Complainant/Petitioner,)	
)	PREFILED REPLY TESTIMONY
v.)	OF DOUGLAS WILSON
)	OF BROAD RIVER ELECTRIC
BROAD RIVER ELECTRIC)	COOPERATIVE, INC.
COOPERATIVE, INC. AND)	
DUKE ENERGY CAROLINAS, LLC,)	
)	
Respondents.)	

Q: State your name?

A: Douglas Wilson.

Q: What will be the substance of your testimony?

A: I will testify to matters in reply to the prefiled testimony of Leonid Kadoshnikov.

Q: Did you previously submit prefiled direct testimony in this matter?

A: Yes.

Q: By that previous prefiled direct testimony, did you testify that you have been employed with the Broad River Electric Cooperative, Inc. For approximately thirty-eight (38) years, during which time you have been employed as a Groundman, then as an Equipment Operator, then as an Apprentice Lineman, then as a Lineman, then as a Foreman, then as a Equipment Specialist, then as the Safety Director, then as the Manager of Operations, and lastly as the present Assistant Manager?

A: Yes.

Q: Since you filed your direct prefiled testimony, have you had an occasion to review the prefiled testimony of Mr. Kadoshnikov?

A: Yes I have.

Q: Specifically Mr. Kadoshikov raises issues about there being a spike in the electric service to his residence, which may have damaged or destroyed his satellite dish or other property. Do you have any evidence of there being any spike in the electric service to his residence during the time period in question?

A: No. As I previously testified to in my prefiled direct testimony, we have no records or any evidence of there being any spike in the electric service to the home of Mr. Kadoshikov.

Q: Were there any other homes in this area that reported any spikes in the electric service to their property?

A: No, there were not.

Q: Do you have any explanation about why there may have been a spike or surge of electricity inside the residence of Mr. Kadoshikov which may have resulted in damage to his property or satellite dish?

A: As I previously testified, we had evidence that Mr. Kadoshikov was tampering with his electric meter. There was first the incident involving the jumper cables in which the meter was bypassed by the use of jumper cables. Secondly, we had the incident where the meter was turned upside down. Obviously, whoever was responsible for the meter tampering could have shorted out the circuit which could have resulted in a spike or surge of electricity to the inside of the home resulting in property damage. Additionally, I know from my experience from dealing with the numerous consumers of electricity in our service area, that satellite dishes are often damaged or destroyed by lightening strikes. Given that the alleged damage to the satellite dish occurred sometime in Spring of 2009, when there are lightening storms, it would not surprise me if the damage could be attributed to a lightening strike. I also note in the letter provided by the distributor of the satellite dish to Mr. Kadoshikov that he also advised Mr. Kadoshikov to obtain additional protection against lightening strikes for his satellite dish.

Q: Again, is there any evidence to your knowledge that would indicate that any surge or spike in the electric service to the home of Mr. Kadoshikov occurred, which may have resulted in damage to his personal property?

A: No, we have no evidence or indication that such a spike or surge of electricity occurred.

Q: Although not relevant to the issue of the reliability or dependability of Broad River Electric Cooperative's electric service to Mr. Kadoshikov's residence, he mentioned in his prefiled testimony some dispute or incident that occurred involving the clearing of the right-of-way to his residence, do you have any information relating to that matter?

A: Yes. While we were inspecting the line and meter of Mr. Kadoshikov to determine if his electricity was being properly metered, it was pointed out to us by Mr. Kadoshikov that some nearby tree limbs were close to and possibly touching the distribution line to his residence. Obviously, where you have a tree limb in close proximity to a distribution line, this can result in arcing and line loss. Additionally, it can create a potential danger to persons who live in proximity to the distribution line. Therefore, we sent out a crew to clear the right-of-way. When the crew arrived at the scene Mr. Kadoshikov then protested the clearing of the right-of-way. Sheriff deputies responded to a call involving our right to clear the right-of-way. Once the Sheriff deputies were on the scene, Mr. Kadoshikov got into a confrontation with the deputies, and they arrested Mr. Kadoshikov as a result of the dispute between the deputies and Mr. Kadoshikov. The deputies acted on their own initiative, and Broad River Electric Cooperative is not the complainant in any criminal action against Mr. Kadoshikov.

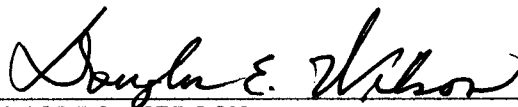
Q: Was the right-of-way of Mr. Kadoshikov's distribution line cleared any differently than any other right-of-way maintained and operated by Broad River?

A: No. We have a standard right-of-way clearance for all right-of-ways of fifteen feet from the center of the distribution line, which is what was cleared in the case of Mr. Kadoshikov's distribution line to his property.

Q: Does this conclude your reply testimony, Mr. Wilson?

A: Yes, it does.

Respectfully submitted,



DOUGLAS WILSON

Broad River Electric Cooperative, Inc.
811 Hamrick Street
Gaffney, South Carolina 29340